



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

US AIRWAYS, INC.,

Plaintiff,

-against-

SABRE HOLDINGS CORPORATION,  
SABRE INC., and  
SABRE TRAVEL INTERNATIONAL  
LIMITED,

Defendants.

Civil Action No. 1: 11 Civ. 2725 (MGC)

ECF Case

**SUPPLEMENTAL STIPULATION AND [REDACTED] ORDER  
REGARDING BCD TRAVEL USA LLC'S DOCUMENT PRODUCTION**

WHEREAS Plaintiff US Airways, Inc. ("US Airways") and Defendants Sabre Holdings Corporation, Sabre Inc. and Sabre Travel International Limited (collectively, "Sabre") are parties to this action; and

WHEREAS, US Airways served a subpoena *duces tecum* on BCD Travel USA LLC ("BCD") seeking the production of certain documents and information (the "Subpoena"); and

WHEREAS, US Airways and BCD have met and conferred regarding BCD's response to US Airways' Subpoena, including the highly confidential nature of the categories of documents and information requested from BCD.

IT IS HEREBY STIPULATED BY AND BETWEEN US AIRWAYS, SABRE AND BCD, THROUGH THEIR RESPECTIVE COUNSEL, AS FOLLOWS:

1. BCD's production of all documents and information responsive to the Subpoena or any other requests for discovery that may be served upon BCD in this matter by any party ("BCD Discovery Material") shall be governed by the Amended Stipulation and Protective Order

entered on November 28, 2012 (Docket No. 123) (the "Amended Protective Order"). BCD hereby joins in the Amended Protective Order and shall have the same protections for BCD Discovery Material produced in this action as any party to this action under the Amended Protective Order, including the right to initiate contempt proceedings for any violation of the Amended Protective Order.

2. In the event that a third party makes an application, or notifies the parties of its intention to make an application, to the Court to compel the parties to produce BCD Discovery Material or unseal the record of proceedings before the Court, the parties to this action shall promptly notify BCD's undersigned counsel of the third party's application, or intention to make such application, and shall include BCD's counsel in all communications with such third party regarding BCD Discovery Material or in any proceeding regarding such BCD Discovery Material.

3. Nothing herein gives BCD any right to obtain access to discovery materials produced by any party or non-party to this action.

4. This stipulation may be executed in counterparts.

Dated: April 8, 2013

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*Counsel for Defendants Sabre, Inc., Sabre Holdings Corporation, and Sabre Travel International Ltd.*

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*Counsel for Non-party BCD Travel USA LLC*

SO ORDERED:

*Subject to amendment by the court as the  
interest of justice requires*

*S/*  
UNITED STATES DISTRICT JUDGE